

EDWARDS ANGELL PALMER & DODGE LLP

750 Lexington Avenue New York, NY 10022 212.308.4411 fax 212.308.4844 eapdlaw.com

Zachary W. Silverman

212.912.2759

fax 866.955.9376

zsilverman@eapdlaw.com

July 22, 2011

Hon. Robert M. Levy
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Lopez v. City of New York, No. CV 05-3624 (RML)

Dear Judge Levy:

We request that you grant leave to defendant City of New York to file a motion for summary judgment. As we have already discussed the relevant issues at the pre-trial conference, we do not believe a pre-motion conference is necessary. However, we will, of course appear if Your Honor deems it appropriate.

Respectfully,



Zachary W. Silverman

cc: Derrick Sells, Esq.
Paul Chin, Esq.